

UNITED STATES BANKRUPTCY COURT

FOR THE

EASTERN DISTRICT OF VIRGINIA

Alexandria Division

In the Matter of:

LANCE F. WELCH

AND

HELENA M. WELCH

Debtors

Chapter 13

Case No. 25-10601-KHK

OBJECTION TO CONFIRMATION OF PLAN,
NOTICE OF OBJECTION TO CONFIRMATION OF PLAN
AND
NOTICE OF SCHEDULED HEARING ON THIS OBJECTION

Thomas P. Gorman, Chapter 13 Trustee, has filed this objection to confirmation of your Chapter 13 Plan filed April 7, 2025. The cause for this objection is as follows:

Violation of 11 U.S.C. §1325(b)(1)(B) & §1325(a)(3) – Disposable Income & Good Faith – Above median Debtors' Form 122C shows \$4,874.27/mo. of disposable income, with no special circumstances, yet have filed a 0% Plan.

Violation of 11 U.S.C. §1325(a)(3) & §1325(a)(6) – Good Faith & Feasibility

- 1) Proposes Plan funding is primarily a \$305,000.00 lump sum payment in month 60.
- 2) Plan is underfunded as follows due to high filed IRS claim (Proof of Claim #6):

PERFORMANCE	Amount of Plan Payment	3,042.15x60	
		305,000.00	
	Number of Months	60	
	Total Receipts		487,529.00
	Disbursements Required		
	Trustee	48,752.90	10.00%
	Attorney	6,750.00	
	Taxes/Other Priority	68,612.43	
	Secured	390,113.30	
	Unsecured	0.00	115,193.741x0%
	Other	0.00	
	Total Disbursements		514,228.63

Notice of Objection To Confirmation

Lance F. Welch and Helena M. Welch, Case # 25-10601-KHK

Violation of 11 U.S.C. §1325(a)(3) & §1325(a)(4) – Good Faith & Liquidation Test – Debtors appear to have understated the value of their real estate, and seem to believe that they have so much equity in their home that they will be able to refinance or sell it easily, which is inconsistent with a 0% Plan.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not wish the court to grant the relief sought in the objection, or if you want the court to consider your views on the objection, then on or before five business days prior to the hearing date, you or your attorney must:

File with the court a written response with supporting memorandum as required by Local Bankruptcy Rule 9013-1. Unless a written response and supporting memorandum are filed and served by the date specified, the Court may deem any opposition waived, treat the motion as conceded, and issue an order granting the requested relief without further notice or hearing. If you mail your response to the court for filing, you must mail it early enough so the court will receive it on or before twenty-one days from the service of this notice. You must mail a copy to the persons listed below.

Attend the hearing to be held on June 12, 2025 at 1:30 p.m., in Courtroom III on the 3rd floor, United States Bankruptcy Court, 200 South Washington Street, Alexandria, VA 22314. If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.

A copy of any written response must be mailed to the following persons:

Thomas P. Gorman
1414 Prince Street, Suite 202
Alexandria, VA 22314

Clerk of the Court
United States Bankruptcy Court
200 South Washington Street
Alexandria, VA 22314

If you or your attorney do not take steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Notice of Objection To Confirmation

Lance F. Welch and Helena M. Welch, Case # 25-10601-KHK

Date: _May 6, 2025_____

_____/s/Thomas P. Gorman_____
Thomas P. Gorman
Chapter 13 Trustee
1414 Prince Street, Suite 202
Alexandria, VA 22314
(703) 836-2226
VSB 26421

CERTIFICATE OF SERVICE

I hereby certify that I have this 6th day of May, 2025, served via ECF to authorized users or mailed a true copy of the foregoing Objection to Confirmation, Notice of Objection and Notice of Hearing to the following parties.

Lance F. Welch
Helena M. Welch
Chapter 13 Debtors
21259 Dubois Ct
Ashburn, VA 20147

Jeffery T. Martin, Jr.
Attorney for Debtor
Martin Law Group, P.C
8065 Leesburg Pike, Ste 750
Vienna, VA 22182

_____/s/ Thomas P. Gorman_____
Thomas P. Gorman